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Attorneys at Law
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GE CI
Employers Reinsurance Corporation
Attn: Special Claims Department
5200 Metcalf Street, P.O. Box 2979
Overland Park KS 66201-1379

Page: 1
November 08, 2005
File No. 113-039M
Statement No: 10058

Attn: Anne Payne

Bozeman v. Integrity Insurance, et al.

Insured: Integrity Insurance Agency, LLC
Claimant: Tanisha Bozeman
Claim No. 608035
Policy No. PAL101267-6

				Rate	Hours	
08/25/2005						
TAM	L110	A104	Review/analyze fax from Anne Payne re: new Integrity suit.	175.00	0.30	52.50
TAM	L110	A104	Review/analyze communications from Anne Payne re: immediate help needed on overdue claim.	175.00	0.10	17.50
TAM	L110	A106	Communicate (with client) Call to R. Cook re: assignment to defend Bozeman, and related issues re: same.	175.00	0.20	35.00
TAM	L110	A103	Draft/revise e-mail to R. Cook re: Bozeman suit needs, and related issues.	175.00	0.20	35.00
TAM	L110	A103	Draft/revise follow-up e-mail to R. Cook re: dec sheet needed.	175.00	0.10	17.50
TAM	L210	A107	Communicate (other outside counsel) Call to D. Maloney re: representation of Integrity and related issues.	175.00	0.10	17.50
TAM	L210	A107	Communicate (other outside counsel) Call to G. Zipkin re: representation of Integrity and need for information.	175.00	0.10	17.50
TAM	L140	A108	Communicate (other external) Call to Anne Payne re: new suit assignment and related issues re: initial fact investigation.	175.00	0.20	35.00
TAM	L210	A103	Draft/revise e-mail to G. Zipkin re: pleading issues, and related concerns re: status of Integrity in new suit involving Progressive.	175.00	0.20	35.00
TAM	L210	A104	Review/analyze court docket re: case status and related issues re: possible removal.	175.00	0.40	70.00
TAM	L210	A103	Draft/revise Entry of appearance.	175.00	0.10	17.50
TAM	L120	A103	Draft/revise letter to Anne Payne re: suit			

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					Rate	Hours	
	TAM	L210	A103	acknowledgment and related issues.	175.00	0.20	35.00
				Draft/revise letter to Maloney re:			
	TAM	L210	A104	appearance and time to answer.	175.00	0.10	17.50
				Review/analyze e-mail from G. Zipkin re:			
	TAM	L210	A103	removal.	175.00	0.10	17.50
				Draft/revise Entry of Appearance for			
				federal action.	175.00	0.10	17.50
08/29/2005							
	TAM	L110	A104	Review/analyze e-mail from G. Zipkin re;			
				fraudulent joinder arguments and removal.	175.00	0.20	35.00
	TAM	L110	A104	Review/analyze fax from R. Cook with			
				Application and declarations pages of			
				Progressive policy.	175.00	0.50	87.50
09/01/2005							
	TAM	L250	A107	Communicate (other outside counsel) Call			
				from Aisha Tinker Bray re: motion to			
				remand, fraudulent joinder issues and			
				related matters re: service.	175.00	0.30	52.50
	TAM	L250	A104	Review/analyze e-mail from Aisha Bray re:			
				pleadings and motion papers.	175.00	0.10	17.50
	TAM	L250	A104	Review/analyze Motion to Remand.	175.00	0.40	70.00
09/02/2005							
	TAM	L250	A104	Review/analyze removal issues raised by			
				Progressive's fraudulent joinder			
				arguments.	175.00	0.60	105.00
	TAM	L120	A103	Draft/revise letter to Anne Payne re;			
				fraudulent joinder motion, and opportunity			
				presented by same.	175.00	0.40	70.00
	TAM	L120	A103	Draft/revise e-mail to R. Cook re: motion to			
				dismiss.	175.00	0.10	17.50
	TAM	L120	A104	Review/analyze e-mail from Anne Payne			
				re: motion to dismiss and fraudulent joinder			
				issues.	175.00	0.10	17.50
	KGS	L110	A104	Review/analyze pleadings and other			
				available documents.	165.00	1.80	297.00
	KGS	L110	A107	Communicate (other outside counsel) with			
				Progressive lawyer re: status.	165.00	0.30	49.50
	KGS	L120	A104	Review/analyze defenses and strategy for			
				defense.	165.00	0.50	82.50
09/06/2005							
	TAM	L110	A104	Review/analyze policy declarations,			
				allegations in complaint and related issues			
				re: alleged misconduct in placing policy,			
				and lack of any real allegations re: same in			
				preparation for client meeting.	175.00	0.50	87.50
	TAM	L110	A106	Communicate (with client) Conference with			
				Richard and Cori Cook re: fact allegations,			
				file materials, documents and related			

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				Rate	Hours	
			matters in preparation for initial motion to dismiss and strategy meeting.	175.00	1.00	175.00
KGS	L120	A106	Communicate (with client) with client about claim and conference.	165.00	0.20	33.00
KGS	L110	A106	Communicate (with client) with client about status file, and course for proceeding.	165.00	0.80	132.00
KGS	L120	A102	Research legal authority to support opposition to motion to remand.	165.00	2.20	363.00
KGS	L240	A103	Draft/revise opposition to motion to remand.	165.00	1.80	297.00
KGS	L240	A102	Research standard for dismissing sham defendants.	165.00	0.70	115.50
KGS	L110	A104	Review/analyze client file.	165.00	0.50	82.50
09/07/2005						
TAM	L110	A104	Review/analyze fax from Cori re: producer			
			<i>redacted</i>			
			Risk placement.	175.00	0.40	70.00
TAM	L110	A106	Communicate (with client) Call to Cori Cook re: assigned risk plan issues, documentation, and understanding of			
			<i>redacted</i>			
			Review/analyze communications from Zipkin re: motion to remand.	175.00	0.30	52.50
TAM	L250	A104	Communicate (other outside counsel) Call to G. Zipkin re: mutual interest issues re: motion to remand, standing issues and related matters.	175.00	0.10	17.50
				175.00	0.30	52.50
TAM	L110	A104	Review/analyze Assigned risk plan issues.	175.00	0.40	70.00
09/08/2005						
TAM	L110	A106	Communicate (with client) call to Cori Cook re: WAIP manual needs and file documents.	175.00	0.10	17.50
KGS	L120	A102	Research governing caselaw for response to motion to remand.	165.00	1.30	214.50
KGS	L250	A103	Draft/revise motion to file amicus brief.	165.00	0.50	82.50
KGS	L240	A103	Draft/revise opposition to motion to remand.	165.00	1.20	198.00
KGS	L110	A104	Review/analyze insurance policy.	165.00	0.50	82.50
09/09/2005						
TAM	L250	A104	Review/analyze potential arguments re: standing, failure to state a claim and failure to identify factual support for elements of broker claim.	175.00	0.50	87.50
KGS	L110	A104	Review/analyze Alaska Auto Insurance Plan.	165.00	0.70	115.50
KGS	L240	A103	Draft/revise opposition to motion to remand.	165.00	2.60	429.00

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					Rate	Hours	
09/11/2005							
KGS	L120	A102	Research good faith and fair dealing principles argued by Plaintiff.	165.00	0.70	115.50	
KGS	L120	A104	Review/analyze cases addressing good faith and fair dealing.	165.00	0.70	115.50	
09/12/2005							
TAM	L120	A104	Review/analyze Progressive arguments re: sham joinder and response to remand.	175.00	0.50	87.50	
TAM	L110	A104	Review/analyze client communications re: <i>re draft of</i>	175.00	0.40	70.00	
TAM	L250	A104	Review/analyze draft opposition to remand re: additional arguments to make re; standing.	175.00	0.60	105.00	
KGS	L120	A102	Research California bad faith cases.	165.00	0.60	99.00	
KGS	L240	A103	Draft/revise opposition to remand motion.	165.00	2.90	478.50	
KGS	L120	A107	Communicate (other outside counsel) with Progressive lawyer re: opposition.	165.00	0.20	33.00	
KGS	L240	A103	Draft/revise affidavit supporting opposition.	165.00	0.80	132.00	
KGS	L240	A106	Communicate (with client) with client re: affidavit.	165.00	0.20	33.00	
KGS	L240	A104	Review/analyze Progressive's opposition to remand motion.	165.00	0.30	49.50	
KGS	L240	A104	Review/analyze currency of authority cited.	165.00	0.40	66.00	
09/13/2005							
TAM	L250	A103	Draft/revise additional sections of opposition brief re: standing issues and related matters re: failure to state a claim against broker for response to Plaintiff's motion.	175.00	2.50	437.50	
TAM	L250	A103	Draft/revise and Finalize oppositions to Motion to Remand.	175.00	0.70	122.50	
KGS	L120	A104	Review/analyze fax from client re: affidavit.	165.00	0.20	33.00	
KGS	L240	A103	Draft/revise client affidavit.	165.00	0.20	33.00	
KGS	L240	A106	Communicate (with client) with client re: affidavit.	165.00	0.20	33.00	
KGS	L120	A106	Communicate (with client) with client re: defenses.	165.00	0.20	33.00	
KGS	L240	A103	Draft/revise proposed order on remand motion.	165.00	0.20	33.00	
09/21/2005							
KGS	L120	A104	Review/analyze plaintiff's reply brief on remand motion.	165.00	0.10	16.50	
KGS	L120	A104	Review/analyze defendant's request for a hearing on remand.	165.00	0.10	16.50	
09/26/2005							
TAM	L250	A104	Review/analyze Plaintiff's reply brief re:				

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				Rate	Hours	
			remand.	175.00	0.20	35.00
TAM	L250	A104	Review/analyze Progressive's request for hearing.	175.00	0.10	17.50
TAM	L250	A107	Communicate (other outside counsel) Call from G. Zipkin re: case status and motion hearing.	175.00	0.20	35.00
10/05/2005						
TAM	L250	A104	Review/analyze court order re: remand and potential dismissal of Integrity.	175.00	0.40	70.00
KGS	L120	A104	Review/analyze court order denying plaintiff's motion to remand.	165.00	0.20	33.00
10/06/2005						
TAM	L120	A103	Draft/revise e-mail to clients re: court ruling on initial motion to remand.	175.00	0.30	52.50
TAM	L120	A104	Review/analyze e-mail from Cori Cook re: court ruling.	175.00	0.10	17.50
			For Current Services Rendered		38.60	6,517.00

Summary

Timekeeper	Title	Hours	Rate	Total
Thomas A. Matthews	Shareholder	14.80	\$175.00	\$2,590.00
Kenneth G. Schoolcraft	Of Counsel	23.80	165.00	3,927.00

Expenses

09/07/2005	B110	E102	Outside printing (Alaska Legal - Obtain client documents for forwarding with discovery production)	38.34
09/15/2005	B110	E102	Outside printing (Alaska Legal Copy - Obtain Integrity Auto Insurance notebook documents for client file and discovery purposes)	47.10
09/23/2005	B110	E105	Telephone (Long Distance (Aug./Sept. '05) Kansas City, MO (x1); Fairbanks, AK (x1))	4.24
09/30/2005	B110	E101	Copies at .10 per page (x498)	49.80
			Total Expenses	139.48

Total Fees and Expenses Accrued This Statement 6,656.48

Balance Due \$6,656.48

Billing History

Fees	Expenses	Finance Charge	Payments
6,517.00	139.48	0.00	0.00

Task Code Summary

			Expenses
B110	Case Administration	0.00	139.48

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Expenses

B100	Administration	0.00	139.48
L110	Fact Investigation/Development	1581.50	0.00
L120	Analysis/Strategy	1485.50	0.00
L140	Document/File Management	35.00	0.00
L100	Case Assessment, Development and Administration	3,102.00	0.00
L210	Pleadings	210.00	0.00
L240	Dispositive Motions	1897.50	0.00
L250	Other Written Motions and Submissions	1307.50	0.00
L200	Pre-Trial Pleadings and Motions	3,415.00	0.00

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Payments received in the same month as the date of this invoice will be reflected on the next in finance charge of .875% per month (10.5% per annum) will be charged on balances not paid within 30 days of the invoice date.